

Fund Transfers – African Terrorists Blend Old and New: Hawala and Satellite Telecommunications

MAJOR ROBERT FELDMAN

Intelligence Analyst, Foreign Military Studies Office, Fort Leavenworth KS, USA

ABSTRACT Attempts to disrupt the flow of funds through Africa used to finance terrorism have been hindered by terrorists utilizing satellite telecommunications in conjunction with hawala, an ancient system of fund transfers based on trust. This arrangement leaves few records for tracing transactions, a task made even more difficult by the general paucity of investigators trained in the languages commonly used for hawala. Acquiring personnel with the appropriate linguistic skills is one of the steps agencies can take to reduce the terrorist financing that occurs through this unique blend of an ancient system with modern technology.

Introduction

International terrorist organizations are blending hawala, an ancient means to transfer funds based on trust, with modern day satellite telecommunication systems to thwart efforts by intelligence agencies and law enforcement to detect and disrupt funding of terrorists. This financial detection and disruption is a key objective of the war on terror.

Millions of dollars have been funneled to al Qaeda using hawala.¹ The terrorist organization then uses hawala to disperse the moneys across its network of operatives around the globe. It is efficient, rapid, and relatively hard to detect. The properties of this hybrid of ancient hawala and modern communications provide a cover difficult to penetrate by outsiders.

Do Not Get it in Writing: Hawala

Hawala, also referred to as Hundi, is Arabic for 'to change'.² It essentially involves the transfer of money without physically moving

Correspondence Address: Major Robert Feldman, Foreign Military Studies Office, 731 McClellan Avenue, Fort Leavenworth, KS 66027, USA.

ISSN 0959-2318 Print/ISSN 1743-9558 Online/06/030356–11© 2006 Taylor & Francis DOI: 10.1080/09592310600672867

funds across borders. While non-Muslims also utilize hawala, it has come to be identified with 'Islamic Banking'.

Hawala's origins are obscure. Some believe it developed in South Asia during medieval times as a way to finance long distance trade. Texts of Islamic jurisprudence from as early as the 8th Century AD refer to hawala. Despite its ancient roots and appearance in religious texts, it is used to transfer funds for modern-day illicit activities, including the trafficking of drugs, gold, and diamonds.^{3,4} A significantly more benign use of hawala, though still frustrating to governments who wish to control it for purposes such as taxation, is remittance of funds by migrant workers to their native lands.

There are many variations of hawala. In its most basic form a network of brokers transfer funds. As an example, a Somali man in New York wishes to transfer money to his father in Mogadishu. The son in New York would give money to a hawala broker, known as a hawaladar. That broker, in turn, would contact a hawaladar in Mogadishu. The New York broker will provide instructions for the disposition of money to the father, as well as agreeing to settle the debt, at a later date, the Mogadishu broker incurs. Both brokers will take a commission.

There is a strong amount of trust built into this system. The son must trust the hawala broker in New York to actually arrange for the transfer of funds. The broker in Mogadishu, who paid the father with his own money, trusts that the New York broker will at some point reimburse him.

It might be difficult for someone from the west, where financial transactions are based on legal instruments, to imagine an economic system based on trust. However, the work of Fukuyama on issues related to trust helps clarify this situation.⁵ Briefly, trust develops when members of a community possess commonly shared norms such as their beliefs in a deity. Social capital, the ability of people to work together in groups for a common purpose, is born from that trust. Social capital, like other forms of capital, can even be transmitted, and is done so through cultural mechanisms such as tradition or religion.

Hawala, which is sometimes used as the word 'trust', is an example of the utilization of social capital. It depends on a group of people working toward a common goal, which is the movement of funds. Its roots are in both tradition, as money has long been moved that way in certain regions of the world, and religion, Islam. Thus, as a young man grows up in a nation such as Somalia, he readily incorporates hawala, which is part of the culture that surrounds him, into his own way of life. When it is time to make a financial transfer, he and others involved in the transaction will rely on what Fukuyama calls 'prior moral consensus', which in relation to hawala means everyone has already agreed to trust each other.

It is because of this trust that paperwork seems to be minimal to none, though disagreement exists over how much is actually kept. Some claim that paperwork is indeed maintained, but that it is often obscure and difficult to follow. Other sources claim no promissory notes are exchanged, and not even records of individual transactions are kept in written form. Instead, the brokers only keep a running tally of how much one owes the other. The actual amount of paperwork created, and the degree it can be used to follow the money, probably varies among different hawaladars.

The settlement of debts between the brokers can take several forms; cash transactions, merchandise, and special favors being some of them. Import/export businesses lend themselves to completing this cycle by altering their prices on their merchandise to incorporate any debt payments. Some of these companies even act as their own hawaladars. Building on the previous example of the son in New York sending money to his father in Somalia, the debt could be paid in the following manner. The hawaladar in New York may own a rug store, while the hawaladar in Somalia manufactures rugs. When the New York hawaladar purchases rugs from the Somali hawaladar for resale in the United States, he may pay over six hundred dollars for five hundred dollars worth of rugs. The difference is the debt owed to the Somali hawaladar. The money in this instance could be transferred using traditional bank accounts, appearing as a legitimate business transaction, and not including the names of the son who transferred the money via hawala or the father who was the recipient.

Numerous examples exist in the files of Interpol of hawala being used for illegal activities. In one instance convictions were obtained for customs violations and tax fraud when a Pakistani in the Washington, DC metropolitan area did hawala transfers for other expatriates. The scheme involved importing surgical items manufactured in Pakistan into the US at inflated prices, facilitating the transfer of money from the US to Pakistan. This was in apparent violation of Pakistani law. In another example from Interpol the results were actually lethal. Here terrorists transferred the proceeds from the sale of narcotics to arms dealers via hawala. They then used the military hardware in the assassination of an Indian politician.

Interpol provides six reasons why hawala thrives despite the inherent risks in using a system based on trust in strangers. Briefly, these are:

(1) Cost effectiveness. This comes from low overhead (some hawaladars have little more than a cell phone), exchange rate speculation, and integrating hawala with existing business activities.

- (2) Efficiency. Most remittances take place in a day or two. It is not dependent upon the actual moving of funds via surface mail.
- (3) Reliability. Unlike large banks which use several steps to process a transaction, with each step being a potential problem, hawala is simple, making it reliable.
- (4) Lack of bureaucracy. No social security number, no passport, no bank account still means no problem.
- (5) Lack of a paper trail. This is especially beneficial if the money is being laundered.
- (6) Tax evasion. Relating to some of the previous reasons, the anonymity involved with hawala often lets it escape taxation.

Thus, even in countries with no formal judiciary or banking systems, such as Somalia, hawala can still be used. However, with countries that do have working banking systems in place, hawala is still widely used, serving as a sort of parallel finance system outside the formal legal one, benefiting from the lack of scrutiny as well as an absence of taxes.

Though the exact size of the hawala system is unknown, estimates of its magnitude in various countries abound. For example, experts suspect approximately five billion dollars moves through hawala networks a year in Pakistan, whereas in India it is estimated to be 40 per cent of the gross domestic product.⁸ Clearly the worldwide movement of funds through hawala is immense.

Attempts to Control Hawala

With a renewed interest in terrorism and money laundering following the attacks on 9/11, there has been a strong push to keep a closer watch on hawala and to attempt to curtail its use by illicit groups.9 Though some countries have outlawed it, actually stopping such a culturally ingrained practice has at times proven elusive. For almost thirty years hawala transactions have been illegal under India's Foreign Exchange Regulation Act, but the flow of funds continues.¹⁰

It is often uncertain whether the countries that ban hawala do so because it can be used for illicit activities such as financing terrorists, or because of the negative economic impact it sometimes has on government coffers, often related to an inability to tax transactions or benefit from skewed exchange rates. As an example, many South Asian nations prohibit currency speculation as well as foreign exchange transactions at anything besides the official rate of exchange. Regulations also exist governing inbound and outbound remittances. Hawala clearly flaunts these rules, often providing better exchange rates with near total anonymity while bypassing the tax collector. 12

Specifically banning hawala by name, and only hawala, would probably prove ineffective as there are numerous other alternative remittance systems similar in concept. Besides, as former Treasury Secretary O'Neill discovered during a trip to Dubai in 2002 to see the hawala system firsthand, and aptly summarized by a BBC reporter, 'Unsurprisingly, not a single trader would admit to involvement in the business, nor to knowledge of how it works'.¹³

Many countries are grappling with the complexity of still allowing hawala while implementing at least a modicum of regulation. Part of the problem lies with the secretive nature of hawala; countries do not even know how much money is being transferred, nor the various forms of hawala used to transfer it. It is difficult to legislate against the unknown.

Another problem with attempting to regulate hawala, as Mohammed El-Qorchi, a senior economist in the IMF's Monetary and Exchange Affairs Department, pointed out, is that there is agreement 'that overregulation and coercive measures will not be effective because they might push IFT [informal funds transfer] businesses, including legal ones, underground. The purpose of any approach is not to eliminate these systems but to avoid their misuse'.¹⁴

Some countries have implemented regulations to curtail or control hawala. Pakistan and the United Arab Emirates require brokers to register. Restricting the amount that may be transferred, or requiring documentation of the transactions are some of the other methods being used, though sometimes with only limited success, by various nations.

Thus, while some countries have tried to curb hawala, especially when used for illicit purposes, it is generally a difficult practice to curtail. It is used by a vast number of people, often for legitimate reasons. Indeed, a large portion of the money moved by hawala is simply expatriates sending remittances home. There it is used to purchase food, clothing, medicine, and other basic necessities. As Anoor Hassan, a Somali in Dubai who trades in foodstuffs, told the BBC, 'I usually send money to my mother every month. If I don't send the bills, they don't get the food that they eat'. ¹⁶

An additional difficulty that countries such as the US have encountered in trying to curtail hawala is that advertisements in papers are often in foreign languages and do not expressly mention hawala. Instead, phrases such as 'sweet rupee deal' or 'great rupee deal' are ambiguously expressed, leaving enforcement agencies without a clear-cut understanding of what is occurring.¹⁷

A lack of investigators skilled in uncovering hawala, sometimes carefully camouflaged in such organizations as supposedly legitimate charities, has also hindered progress in controlling it. As Professor Barry Rider, head of London University's Institute of Advanced Legal Studies said six months after the attack on 9/11, 'That there is a shortage

of human experience in the field is undoubted. There's been a surge of media interest, but when you go to the conferences (about disrupting money laundering and terrorist finance) you find a relatively small number of rather bemused people'. 18

Satellite Telecommunications, a Modern Technology Perfect for Ancient Ways

Satellite telecommunications utilize ground-based devices that can send signals to, as well as receive them from, satellites. Thus, the satellite serves as a distant relay, receiving messages from one ground-based device, perhaps in Kenya, and forwarding it to another ground-based device, perhaps in Somalia. The various forms of satellite telecommunications are named according to the ground-based devices used to send and receive signals. Two of special note because they are relatively small and inexpensive, making them particularly well suited for use by terrorists, are VSATs and handheld satellite phones.

VSATs is the acronym for very small aperture terminals, devices with an antenna generally less than two meters in diameter. ¹⁹ Introduced in the 1980s, they are a mature technology, and now comprise hundreds of thousands of units installed around the world.²⁰

There are several reasons VSATs have gained in such popularity. They are relatively inexpensive, with some units available for as low as \$3,500. Additionally, they are easy to set up and maintain, and can readily be expanded or upgraded to offer additional capabilities.

VSATs' properties have made them a common choice to serve as the devices behind the cybercafes proliferating throughout Africa. These cafes do not employ security procedures, nor do they collect information on their customers, making them almost ideal for use by anyone desirous of keeping their activities hidden.

Al Qaeda is known to use cybercafes. Following American airstrikes in Afghanistan, the terrorist organization utilized cybercafes in Pakistan to send e-mails in an attempt to regroup.^{21,22} The terrorists' anonymity enables them to blend in with the crowds all vying for terminal usage.

Smaller, more portable and easier to conceal than VSATs are handheld satellite phones. These devices, which can weigh less than a pound, are similar to the VSATs in that they utilize satellites as relay stations. Their power sources include batteries, auto cigarette lighter adapters, and flexible solar panels that can be rolled up. They can be purchased or rented from various telecom providers. The fact that they can easily be taken from one country to another and still be able to send and receive information, as they are not dependent on local telecom operators, makes them a valuable tool for businessmen, diplomats, journalists, and terrorists to use. Osama Bin Laden has one.²³ It is highly probable that

the 'satellite contraption with a solar charger' discovered with the Al Isla terrorist group suspects, arrested in Kenya on 22 February 2005 for the slaying of BBC journalist Katie Hilma in Somalia earlier that week, is a handheld satellite phone.²⁴

Hawala and Satellite Telecommunications: A Powerful Mix

By combining the ancient money transfer system of hawala with modern day satellite telecommunications, terrorists have made the task of uncovering their fund transfers difficult. It is truly an example where the sum is greater than the whole of its parts, for either taken alone is difficult to trace, but taken together that task becomes significantly harder.

The popularity of hawala and satellite communications in Africa as well as other locations has added to the difficulty in tracking terrorists. Internet cafes, also known as cybercafes, sometimes double as hawala companies. 25 This is the case in Somalia, where an estimated 23 per cent of the nation's income is sent from the nearly 25 per cent of the population living abroad. The internet cafes can provide both a location for fund transfers as well as an opportunity to communicate with expatriate relatives. In other African countries disguised terrorists could easily hide in the crowds of businessmen, tourists, and locals who frequent such cafes. Their e-mails, whether coded or not, become part of the immense internet traffic generated by these sites, making it difficult to pick their surreptitious messages regarding fund transfers for weapons purchases from the legitimate ones asking for additional funds to purchase food or clothing. Compounding the problem is the use of hawala and satellite telecommunications by groups other than terrorists, but still involved in criminal activity, though there is certainly a significant overlap between them, with some terrorist organizations funding their activities via illegal activity. Thus, non-terrorist narcotraffickers, smugglers and other such types may be sending e-mails that sound similar to the ones some terrorists use, further complicating the efforts of intelligence agencies to tease out messages primarily related to terrorism. With too few linguists on their staffs versed in the languages of Africa, the task not only of separating criminal messages from those with legitimate aims, but also of separating terrorist communications from other criminal activities, becomes incredibly daunting.

By providing reliable connections between even remotely located people, the use of satellite communications makes the problem of using hawala to transfer funds for illicit purposes an even greater threat when compared to how it operated in the past. Because of the expense involved in installing fixed-line telephones, as well as the associated bureaucracy and corruption, there were relatively few phones throughout most of Africa. However, the low start-up costs of satellite

communications has revolutionized the ability of people in many remote locations throughout Africa to be connected with the outside world. Thus, what used to take days in the past, for the first hawala broker to contact a second broker in an African city (for the vast majority of phones were in cities), who then had to reach the intended recipient in a rural area, perhaps by sending someone to travel by foot through dangerous terrain, can now happen at the speed of light. Using satellite telecommunications that create a direct connection between two brokers, the first hawaladar can contact a second hawaladar in a remote area and quickly deliver funds to the intended recipient. This rapidity can keep intelligence agencies off balance as events unfold too quickly for them to react in time.

Summary and Suggested Courses of Action

Terrorists in Africa and elsewhere are exploiting the technologies developed by countries they have avowed to destroy, essentially turning the western world's own high tech inventions against itself. Nowhere is this more evident than in the use of satellite telecommunications.

However, the terrorists are also exploiting the difficulties in penetrating some of their ancient traditions, such as the money transfer system known as hawala. In the west, with its tradition of precisely recording every transaction, and thus leaving a paper trail that can often be easily followed, the use of an honor system to manage fund transfers appears alien and difficult to penetrate.

Thus, terrorists are using both the old and the new in their war against the west, just as the west must do against them. It is important in the area of satellite telecommunications that more sophisticated eavesdropping devices be developed, as well as automated facilities to sort through the myriad of messages in order to find ones involving terrorist activities. Tracking can be done, as evidenced in the case of Daniel Pearl, the Wall Street Journal reporter who was kidnapped and murdered by terrorists in Pakistan. The group's e-mails from a cybercafe were able to be traced, leading to their arrest.²⁶

In the area of hawala more human intelligence, especially with linguists trained in the languages commonly used for the money transfers, could prove invaluable in helping to keep track of the enormous sums of money flowing to terrorists. Developing human assets with the requisite skills that can penetrate a system that relies on trust and stealth will take time.

There should also be increased pressure on countries that permit, or inadequately regulate hawala, to further control it. The United Arab Emirates, in particular, warrants this additional attention. It is probably not a coincidence that Dubai is not only a center for hawala, but also for telecommunications. Both its banks and its informal money transfer systems, despite the implementation of tighter government regulations, remain a focus in the investigation of terror funding. This is no surprise given that approximately half of the \$250,000 spent on the 9/11 attack was wired from Dubai banks to the al-Qaeda terrorists in the US.²⁷

Governments and private organizations must learn to recognize illicit transfers via hawala and other alternative remittance systems. Information related to how to recognize these transfers, as well as observed criminal activity, needs to be shared, for such systems are truly transnational. Interpol's Anti-Money Laundering Unit, which the organization describes as being 'dedicated to increasing the flow of money laundering information among financial investigators', is helping tremendously in this effort.²⁸

So intertwined are hawala and satellite telecommunications that sometimes the funding for VSATs and handheld satellite phones is through hawala, which in turn allow even greater fund transfers to occur. It is a symbiotic relationship, with each actor benefiting the other, thus allowing both to grow. This bond can be used to the advantage of intelligence agencies. By targeting one, the other can be, at least in part, disrupted. Thus, interrupting the flow of hawala funds might impede the purchase of telecom equipment by terrorists, and jamming terrorists' telecommunications might impede their flow of funds.

There have been some successes, to be sure. Western countries have frozen accounts, blacklisted organizations, and applied pressure to other nations to take appropriate steps to curb hawala, sometimes as part of a broader effort in the attack on money laundering. The Financial Action Task Force (FATF), the international secretariat in Paris charged by its 30-odd members with developing strategies to combat both terrorist financing and money laundering, has developed nine recommendations to help spot transactions linked to the former and 40 recommended countermeasures against the latter.²⁹ The recommendations against money laundering, including items such as prohibiting the establishment of shell banks and having financial institutions bar anonymous accounts, would make illegal transactions less easy to hide.³⁰ Numerous international bodies have endorsed or adopted the list, reflecting an attempt by at least a portion of the global community to combat illegal financial transactions.

Some of the impetus for the new-found cooperation in the war against money laundering can be attributed to the events of 9/11. This is especially true for the US and EU which, in response to the threat to both of them by what has been described as 'Islamic extremist terrorism', have found their security objectives increasingly converging since that date.³¹ Not much more than a month after the attacks, the European Commission formally adopted a directive on money laundering, signaling once again the importance it places on disrupting the funding of terrorism.

These efforts have all been steps in the right direction, but much more needs to be done. However, it is unrealistic to expect the complete cessation of hawala and other alternative money transfer systems. It is a system that has adapted and survived for more than a thousand years, and is deeply enshrined in the cultures of many nations, especially those with large Muslim populations. The west has a tendency to view a nation's economy as a separate entity, when 'in reality it is inextricably tied to the social and political life' of a society. ³² Thus, ill-conceived or clumsy attempts to curb hawala, which in some countries is an integral part of a people's way of life, could drive it deeper underground, putting it further from the reach of law enforcement. Nor is it necessarily desirable to eliminate hawala. Many transactions are for relatively small amounts, often sent home by expatriate workers to support their families, and with the deliberate avoidance of the unfamiliar, bureaucratic, modern banking system.

An approach that targets the use of hawala for terrorist financing and other illegal activities will probably be more fruitful than one that attempts to eliminate it completely. Limiting the attack on hawala to only terrorist and criminal transactions would also be more likely to appeal to those Islamic nations that do not wish to eliminate an economic tradition, but only to regulate it. With the need for such countries to 'buy in' to a global approach to combat terrorist financing, an acceptance by the west that hawala is not inherently evil, but rather is a system that can be used for constructive or destructive purposes, is imperative.

Thus, elimination of hawala may not be possible or even desirable. However, with appropriate resources dedicated to the task, significant dents could probably be made in its use for illicit purposes.

Satellites and hawala, the new and the old, are posing a danger to the civilized world. To combat them we must take a step forward and develop advanced technologies to trace satellite communications, and take a step back to better understand how money transfer occurred before the evolution of impersonal modern day banking practices.

Disclaimer

The views expressed in FMSO publications and reports are those of the authors and do not necessarily represent the official policy or position of the Department of the Army, Department of Defense, or the US Government.

NOTES

- 1. Anderson, Kevin, 'Hawala System Under Scrutiny', 8 Nov 2001, BBC News, 27 Feb. 2005. http://news.bbc.co.uk/2/hi/business/1643995.stm.
- 2. Vaknin, Sam, 'Hawala, or the Bank that Never Was', 1 Jan. 2002 (est). Samvak.tripod.com, 27 Feb. 2005. http://samvak.tripod.com/nm104.html.
- 3. Anderson, Kevin.

366 Major Robert Feldman

- 'US Expands Dirty Money Investigation', 26 July 2002, BBC News, 20 March 2005, http://news.bbc.co.uk/1/hi/business/2153788.stm.
- 5. Fukuyama F., *Trust: The Social Virtues and the Creation of Prosperity* (New York: Free Press Paperbacks, 1995).
- 6. Jost, Patrick M. and Sandhu, Harjit S. 'The Hawala Remittance System and its Role in Money Laundering', Jan. 2000, Interpol, 26 Feb. 2008. http://www.interpol.int/Public/FinancialCrime/MoneyLaundering/hawala/default.asp#12.
- 7. Jost, Patrick M and Sandhu, Harjit S.
- 8. Looney, Robert E. 'Following the Terrorist Informal Money Trail: The Hawala Financial Mechanism', 1 Nov. 2002, Center for Contemporary Conflict, 2 Feb. 2006. http://www.ccc.nps.navy.mil/rsepResources/si/nov02/southAsia.asp.
- 9. El-Qorchi, Mohammed, 'Hawala', Dec. 2002, Finance and Development, a Quarterly Magazine of the IMF, 20 March 2005. http://www.imf.org/external/pubs/ft/fandd/2002/12/elqorchi.htm.
- 10. Cottle, Michelle, 'Hawala v the War on Terrorism', 15 Oct. 2001, *The New Republic*, 20 March 2005. http://www.tnr.com/101501/cottle101501.html>.
- 11. Reszat, Beate, 'Hawala', 4 Dec. 2002, Hamburg Institute of International Economics, 20 March 2005. http://www.hwwa.de/Projekte/IuD_Schwerpunkte/IDSPs/Asia_Gateway/Hawala.htm>.
- 12. Jost, Patrick and Sandhu, Harjit.
- 13. Scott-Joynt, Jeremy, 'The Battle Against Blood Money', 14 March 2002, BBC News, 20 March 2005. http://news.bbc.co.uk/1/hi/business/1867314.stm.
- 14. El-Qorchi, Mohammed.
- 15. 'Fear Over US Hawala Crackdown', 6 Feb. 2004, BBC News, 14 Feb. 2005. http://news.bbc.co.uk/2/hi/middle_east/3463683.stm.
- 16. Ibid.
- 17. Jost Patrick and Sandhu, Harjit.
- 18. Scott-Joynt, Jeremy.
- 19. 'VSAT Satellite', 22 Nov. 1998, Nova Stars, 14 Feb. 2005. http://the-saudi.net/communication/vsat/.
- 20. 'Why Use Satellite?' 22 Nov. 1998, Nova Stars, 14 Feb. 2005. http://the-saudi.net/communication/vsat/why_use_satellite.htm.
- Eng, Paul, 'Filtering Out Terrorists' 15 April 2002, ABC News as reported by InfosecNews, 25 Feb. 2005. http://www.securityfocus.com/archive/12/267700.
- 22. Kassen, Ron, 'Terrorists Using Cybercafes', 17 April 2002, Geek.com. 25 Feb. 2005. http://www.geek.com/news/geeknews/2002apr/gee20020417011226.htm.
- 23. Testimony of J.T. Caruso, Acting Assistant Director, Counter Terrorism Division, FBI Before the Subcommittee on International Operations and Terrorism, Committee on Foreign Relations, United States Senate, 18 Dec. 2001. 'Al-Qaeda International' 25 Feb. 2005. http://www.fbi.gov/congress/congress01/caruso121801.htm.
- 24. Wabala, Dominic. 'Four Terror Suspects Arrested', 22 Feb. 2005, *The Nation*, 25 Feb. 2005. http://allafrica.com/stories/200502220117.html.
- 25. Winter, Joseph, 'Somalia's Diaspora Offers a Financial Lifeline', 24 Nov. 2004, BBC News, 25 Feb. 2005. http://news.bbc.co.uk/2/hi/africa/4038799.stm.
- 26. 'Tracing the Kidnappers' E-mails', 6 Feb. 2002, BBC News, 27 Feb. 2005. http://news.bbc.co.uk/1/hi/sci/tech/1805173.stm.
- 27. 'Dubai: A Financial Hub for Terror Funds', 18 Jan. 2004, *The Times of India*, 20 March 2005. http://www.freerepublic.com/focus/f-news/1060292/posts.
- 28. Interpol Anti-Money laundering Unit, 6 Sept. 2005, Interpol, 2 Feb. 2006. http://www.interpol.com/Public/FinancialCrime/MoneyLaundering/Unit.asp.
- 29. Scott-Joynt, Jeremy.
- 30. 'FATF Documents on the Forty Recommendations', 2003, FATF-GATI 1 Feb. 2006. http://www.fatf-gafi.org/document/28/0,2340,en_32250379_32236930_33658140_1_1_1,00.html#r4.
- 31. Nourbakhsh, Amir Ali, 'Iran: Majlis Reformists Take on the Money Launderers', May 2004, *Iran Focus*, 1 Feb. 2006. http://www.payvand.com/news/04/may/1179.html >
- 32. Fukuyama, Francis.